

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 WILBERT E. BENNETT
Supervising Deputy Attorney General
3 CLAUDIA H. PHILLIPS, State Bar No. 202645
Deputy Attorney General
4 1515 Clay Street, 20th Floor
P.O. Box 70550
5 Oakland, CA 94612-0550
Telephone: (510) 622-2221
6 Facsimile: (510) 622-2270

7 Attorneys for Complainant

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BEFORE THE
CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. OT2008-13

12 TERRI ANN SCHONBROD
15551 Tracy Street, Apt. C
13 San Lorenzo, California 94580

ACCUSATION

14 Occupational Therapist License No. OT6305

15 Respondent.

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17 Complainant alleges:

18 PARTIES

19 1. Heather Martin (Complainant) brings this Accusation solely in her official
20 capacity as the Executive Officer of the California Board of Occupational Therapy, Department
21 of Consumer Affairs.

22 2. On or about February 14, 2003, the California Board of Occupational
23 Therapy issued Occupational Therapist License Number OT6305 to Terri Ann Schonbrod
24 (Respondent). The Occupational Therapist License was in full force and effect at all times
25 relevant to the charges brought herein and will expire on March 31, 2010, unless renewed.

26 JURISDICTION

27 3. This Accusation is brought before the California Board of Occupational
28 Therapy (Board), Department of Consumer Affairs, under the authority of the following laws.

1 All section references are to the Business and Professions Code (Code) unless otherwise
2 indicated.

3 STATUTORY PROVISIONS

4 4. Section 2570.28 of the Code states, in pertinent part:

5 "The board may deny or discipline a licensee for any of the following:

6 "(a) Unprofessional conduct

7 ". . . .

8 "(e) Conviction of a crime or of any offense substantially related to the
9 qualifications, functions, or duties of a licensee, in which event the record of the conviction shall
10 be conclusive evidence thereof. . . ."

11 5. Section 2570.29 of the Code states, in pertinent part:

12 "In addition to other acts constituting unprofessional conduct within the meaning
13 of this chapter, it is unprofessional conduct for a person licensed under this chapter to do any of
14 the following:

15 "(b) Use to an extent or in a manner dangerous or injurious to himself or herself,
16 to any other person, or to the public, or that impairs his or her ability to conduct with safety to the
17 public the practice authorized by his or her license, of any of the following:

18 ". . . .

19 "(3) Alcoholic beverages.

20 "(c) Be convicted of a criminal offense involving the prescription, consumption,
21 or self-administration of any of the substances described in subdivisions (a) and (b) of this
22 section . . . in which event the record of the conviction is conclusive evidence thereof."

23 6. Section 2570.30 of the Code states:

24 "The board shall retain jurisdiction to proceed with any investigation, action or
25 disciplinary proceeding against a license, or to render a decision suspending or revoking a
26 license, regardless of the expiration, lapse, or suspension of the license by operation of law, by
27 order or decision of the board or a court of law, or by the voluntary surrender of a license by the
28 licensee."

1 7. Section 125.3 of the Code provides, in pertinent part, that the Board may
2 request the administrative law judge to direct a licensee found to have committed a violation or
3 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
4 and enforcement of the case.

5 8. Section 493 of the Code states:

6 "Notwithstanding any other provision of law, in a proceeding conducted by a
7 board within the department pursuant to law to deny an application for a license or to suspend or
8 revoke a license or otherwise take disciplinary action against a person who holds a license, upon
9 the ground that the applicant or the licensee has been convicted of a crime substantially related to
10 the qualifications, functions, and duties of the licensee in question, the record of conviction of the
11 crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact,
12 and the board may inquire into the circumstances surrounding the commission of the crime in
13 order to fix the degree of discipline or to determine if the conviction is substantially related to the
14 qualifications, functions, and duties of the licensee in question. . . ."

15 **FIRST CAUSE FOR DISCIPLINE**

16 (Conviction of a Substantially Related Crime)

17 9. Respondent is subject to disciplinary action under Code section 2570.28(e)
18 in that she was convicted of a crime substantially related to the duties, qualifications, and
19 functions of an occupational therapist. The circumstances are set forth in paragraph 10, below.

20 10. On or about October 23, 2008, in *People v. Terri Ann Schonbrod*,
21 Alameda County Superior Court Case No. 412562, Respondent was convicted by plea of no
22 contest of violating Vehicle Code section 23152(b), Driving While Having a .08% or Higher
23 Blood Alcohol. Pursuant to said conviction, Respondent was sentenced to serve 15 days in the
24 county jail and was placed on three years probation under terms which included, but were not
25 limited to, the temporary suspension of her driver's license and the use of a breath alcohol
26 ignition interlock device.

27 The factual circumstances of said conviction are that on or about July 20, 2008 at
28 approximately 12:07 a.m., a California Highway Patrol Officer observed Respondent weaving

1 across two lanes of traffic while exiting Interstate 880. When the officer made contact with
2 Respondent, Respondent displayed objective signs of intoxication and failed to perform the Field
3 Sobriety Tests as directed. Upon her arrest at approximately 1:26 a.m., Respondent provided two
4 breath samples which indicated the presence of ethyl alcohol at a blood alcohol concentration of
5 0.22%.

6 SECOND CAUSE FOR DISCIPLINE

7 (Unprofessional Conduct: Use of Alcohol in a Dangerous Manner)

8 11. Respondent is subject to disciplinary action under Code section
9 2570.29(b)(3) in conjunction with Code section 2570.28(a) in that she engaged in unprofessional
10 conduct by using alcohol in a dangerous manner. The circumstances are set forth in paragraph
11 10, above.

12 THIRD CAUSE FOR DISCIPLINE

13 (Unprofessional Conduct: Conviction of a Crime Involving the Consumption of Alcohol)

14 12. Respondent is subject to disciplinary action under Code section 2570.29(c)
15 in conjunction with Code section 2570.28(a) in that she was convicted of a criminal offense
16 involving the consumption of alcohol. The circumstances are set forth in paragraph 10, above.

17 DISCIPLINE CONSIDERATIONS

18 13. To determine the degree of discipline, if any, to be imposed on
19 Respondent, Complainant alleges that on or about January 1, 2005, in a prior disciplinary action
20 entitled In the Matter of the Accusation Against Terri Ann Schonbrod, California Board of
21 Occupational Therapy Case Number 3-2004, Respondent's license was revoked based on
22 violations of Code section 2570.28(e), Convictions of Substantially Related Crimes, and Code
23 section 2570.29(c) in conjunction with Code section 2570.29(a), Unprofessional Conduct due to
24 Convictions of Offenses Involving the Consumption of Alcoholic Beverages. The revocation of
25 Respondent's license was stayed and she was placed on three years probation. (A copy of the
26 Board's Decision in Case Number 3-2004 is attached hereto as Exhibit A and is incorporated
27 herein by reference.) The probation term was successfully completed on January 1, 2008.

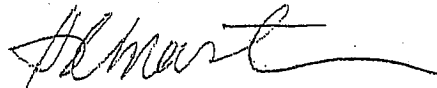
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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the California Board of Occupational Therapy issue a decision:

1. Revoking or suspending Occupational Therapist License Number OT6305, issued to Terri Ann Schonbrod;
2. Ordering Terri Ann Schonbrod to pay the California Board of Occupational Therapy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and
3. Taking such other and further action as deemed necessary and proper.

DATED: March 18, 2009



HEATHER MARTIN
Executive Officer
California Board of Occupational Therapy
Department of Consumer Affairs
State of California
Complainant

SF2009403-160

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EXHIBIT A

BEFORE THE
CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 3-2004

TERRI ANN SCHONBROD
70 Harian Street, No. 301
San Leandro CA 94577

Occupational Therapist License No. OT 6305

Respondent.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by
the California Board of Occupational Therapy, Department of Consumer Affairs, as its Decision
in this matter.

This Decision shall become effective on January 1, 2005

It is so ORDERED December 2, 2004

Luella Grangard

LUELLA GRANGARD, Board President
CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

Complainant

Certified to be a true and correct
Copy of the original on file with
The Board of Occupational Therapy

2/10/09
Date

[Signature]
Signature

1 BILL LOCKYER, Attorney General
of the State of California
2 GLORIA A. BARRIOS, State Bar No. 94811
Deputy Attorney General
3 California Department of Justice
1515 Clay Street, 20th Floor ~ P.O. Box 70550
4 Oakland, CA 94612-0550
Telephone: (510) 622-2144
5 Facsimile: (510) 622-2121
E-mail: gloria.barrios@doj.ca.gov

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7 Attorneys for Complainant
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10 BEFORE THE
CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
11 STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 3-2004

13 TERRI ANN SCHONBROD
70 Harian Street, No. 301
14 San Leandro CA 94577

STIPULATED SETTLEMENT
AND DISCIPLINARY ORDER

15 Occupational Therapist License No. OT 6305

16 Respondent.
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18 IT IS HEREBY STIPULATED AND AGREED by and between the parties
19 to the above-entitled proceedings that the following matters are true:

20 PARTIES

21 1. Gretchen L. Kjose (Complainant) is the Executive Officer of the California
22 Board of Occupational Therapy. She brought this action solely in her official capacity
23 and is represented in this matter by Bill Lockyer, Attorney General of the State of California,
24 by Gloria A. Barrios, Deputy Attorney General.

25 2. Terri Ann Schonbrod (Respondent) is representing herself in this proceeding
26 and has chosen not to exercise her right to be represented by counsel.

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3. On or about February 14, 2003, the California Board of Occupational Therapy issued Occupational Therapist License No. 6305 to Terri Ann Schonbrod (Respondent). The License was in full force and effect at all times relevant to the charges brought in Accusation No. 3-2004 and will expire on March 31, 2005, unless renewed.

JURISDICTION

4. Accusation No. 3-2004 was filed before the California Board of Occupational Therapy (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on September 4, 2004. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 3-2004 is attached as Exhibit 1 and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 3-2004. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 3-2004.

9. Respondent agrees that her Occupational Therapist License is subject to discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

CONTINGENCY

10. This stipulation shall be subject to approval by the California Board of Occupational Therapy. Respondent understands and agrees that counsel for Complainant and the staff of the California Board of Occupational Therapy may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

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DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Occupational Therapist License No. 6305 issued to Respondent Terri Ann Schonbrod is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following terms and conditions.

1. Obey All Laws.

Respondent shall obey all federal, state and local laws, and regulations governing the practice of occupational therapy in California. Respondent shall submit, in writing, a full and detailed account of any and all violations of the law to the Board within five (5) days of occurrence.

2. Compliance With Probation Program And Quarterly Report Requirements.

Respondent shall fully comply with terms and conditions of the probation established by the Board and shall cooperate with the representatives of the Board in its monitoring and investigation of the Respondent's compliance with probation.

Respondent, within ten (10) days of completion of the quarter, shall submit quarterly written reports to the Board on a Quarterly Report of Compliance form obtained by the Board. (Attachment A)

3. Personal Appearances.

Upon reasonable notice by the Board, respondent shall report to and make personal appearances at times and locations as the Board may direct.

4. Notification of Address And Telephone Number Change(s).

Respondent shall notify the Board, in writing, within five (5) days of a change of residence or mailing address, of her new address and any change in her work and/or home telephone numbers.

5. Tolling for Out-of-State Practice, Residence or In-State Non Practice.

In the event Respondent should leave California to reside or to practice outside the state for more than thirty (30) days, Respondent shall notify the Board or its designee in writing, within ten (10) days of departure and return. All provisions of probation other than the quarterly report requirements, examination requirements, and educational requirements,

1 shall be held in abeyance until respondent resumes practice in California. All provisions
2 of probation shall recommence on the effective date of resumption of practice in California.

3 6. Notification to Employer(s).

4 When currently employed or applying for employment in any capacity in
5 any health care profession, Respondent shall notify her employer of the probationary status of
6 Respondent's license. This notification to the current employer shall occur no later than the
7 effective date of the Decision. Respondent shall notify any prospective health care employer
8 of her probationary status with the Board prior to accepting such employment. This notification
9 shall be by providing the employer or prospective employer with a copy of the Board's
10 Accusation and Disciplinary Decision.

11 Respondent shall cause each health care employer to submit quarterly reports
12 to the Board. The report shall be on a form provided by the Board, shall include a performance
13 evaluation and such other information as may be required by the Board.

14 Respondent shall notify the Board, in writing, within five (5) days of any change
15 in employment status. Respondent shall notify the Board, in writing, if she is terminated from
16 any occupational therapy or health care related employment with a full explanation of the
17 circumstances surrounding the termination. (Attachment B)

18 7. Employment Requirements And Limitations.

19 During probation, Respondent shall work in her licensed capacity in the State
20 of California. This practice shall consist of no less than six (6) continuous months and of no less
21 than twenty (20) hours per week.

22 While on probation, Respondent shall not work for a registry or in any private
23 duty position, except as approved, in writing, by the Board. Respondent shall work only
24 on a regularly assigned, identified and pre-determined work site(s) and shall not work in a float
25 capacity except as approved, in writing, by the Board.

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1 8. Supervision Requirements.

2 Respondent shall obtain prior approval from the Board, before commencing
3 any employment, regarding the level of supervision provided to Respondent while employed
4 as an occupational therapist or occupational therapy assistant.

5 Respondent shall not function as a supervisor during the period of probation
6 except as approved, in writing, by the Board.

7 9. Continuing Educational Requirements.

8 Respondent shall complete continuing education directly relevant to the
9 violation(s) as specified by the Board. Continuing education shall be completed within a period
10 of time designated by the Board, which time frame shall be incorporated as a condition of this
11 probation.

12 Continuing education shall be in addition to the professional development
13 activities required for license renewal. The Board shall notify Respondent of the course content
14 and number of contact hours required. Within thirty (30) days of the Board's written notification
15 of the assigned course work, Respondent shall submit a written plan to comply with this
16 requirement. The Board shall approve such plan prior to enrollment in any course of study.

17 Failure to satisfactorily complete the required continuing education as scheduled
18 or failure to complete same no later than 100 days prior to the termination of probation shall
19 constitute a violation of probation. Respondent is responsible for all costs of such continuing
20 education. Upon successful completion of the course(s), Respondent shall cause the instructor
21 to furnish proof to the Board within thirty (30) days of course completion.

22 10. Maintenance of Valid License.

23 Respondent shall, at all times while on probation, maintain an active current
24 license with the Board, including any period during which suspension or probation is tolled.

25 11. Cost Recovery Requirements.

26 Cost recovery is \$2,349.50. Where an order for recovery of costs is made,
27 Respondent shall make timely payment as directed in the Board's Decision pursuant to Business
28 and Professions Code Section 125.3. Failure to make payments in accordance with any formal

1 agreement entered into with the Board or pursuant to any Decision by the Board shall be
2 considered a violation of probation.

3 The Board may conditionally renew or reinstate, for a maximum of one year,
4 the license of any respondent who demonstrates financial hardship. Respondent shall enter into
5 a formal agreement with the Board to reimburse the unpaid costs within that one year period
6 with payments to be complete no later than three months prior to the end of the probation term.

7 Except as provided above, the Board shall not renew or reinstate the license
8 of any Respondent who has failed to pay all the costs as directed in a Decision.

9 12. Violation of Probation.

10 If Respondent violates probation in any respect, the Board after giving
11 Respondent notice and an opportunity to be heard, may revoke probation and carry out the
12 disciplinary order which was stayed. If an accusation or petition to revoke probation is filed
13 against the Respondent during probation, the Board shall have continuing jurisdiction until
14 the matter is final, and the period of probation shall be extended until the matter is final.

15 13. Completion of Probation.

16 Upon successful completion of probation, Respondent's license will be
17 fully restored.

18 14. Chemical Dependency Support/Recovery Groups.

19 Within five (5) days of the effective date of the Decision, Respondent shall begin
20 attendance at a chemical dependency support group (e.g. Alcoholics Anonymous, Narcotics
21 Anonymous, Nurse Support Group). Verified documentation of attendance shall be submitted
22 by Respondent with each quarterly report. Respondent shall continue attendance in such a group
23 for the duration of probation.

24 15. Abstain From Controlled Substances.

25 Respondent shall completely abstain from the personal use or possession
26 of controlled substances, as defined in the California Uniform Controlled Substances Act,
27 and dangerous drugs as defined in Section 4021 and 4022 of the Business and Professions Code,
28 except when lawfully prescribed by a licensed practitioner for a bona fide illness.

16. Abstain From Use of Alcohol.

Respondent shall completely abstain from the use of alcoholic beverages during the period of probation.

17. Submit Biological Fluid Samples.

Respondent shall immediately submit to biological fluid testing, at Respondent's cost, upon request by the Board or its designee. There will be no confidentiality in test results; positive test results will be immediately reported to the Board and the Respondent's current employer.

ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Occupational Therapist License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the California Board of Occupational Therapy.

DATED: 10-7-04

Terri Ann Schonbrod
TERRI ANN SCHONBROD

Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the California Board of Occupational Therapy of the Department of Consumer Affairs.

DATED: 10-26-04

BILL LOCKYER, Attorney General
of the State of California

Gloria A. Barrios
GLORIA A. BARRIOS
Deputy Attorney General

Attorneys for Complainant

1 BILL LOCKYER, Attorney General
of the State of California
2 GLORIA A. BARRIOS, State Bar No. 94811
Deputy Attorney General
3 California Department of Justice
1515 Clay Street, 20th Floor ~ P. O. Box 70550
4 Oakland, CA 94612-0550
Telephone: (510) 622-2144
5 Facsimile: (510) 622-2121
E-mail: gloria.barrios@doj.ca.gov
6

7 Attorneys for Complainant

8
9 BEFORE THE
10 CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
11 STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 3-2004

13 TERRI ANN SCHONBROD
70 Harian Street, No. 301
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ACCUSATION.

15 Occupational Therapist License No. OT 6305,

16 Respondent.

17 Complainant alleges:

18 PARTIES

19 1. Gretchen L. KJose (Complainant) brings this Accusation solely in her
20 official capacity as the Executive Officer of the California Board of Occupational Therapy,
21 Department of Consumer Affairs.

22 2. On or about February 14, 2003, the California Board of Occupational Therapy
23 issued Occupational Therapist License Number OT 6305 to Terri Ann Schonbrod (Respondent).
24 The Occupational Therapist License will expire on March 31, 2005.

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JURISDICTION

3. This Accusation is brought before the California Board of Occupational Therapy (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 2570.28 states:

"The board may deny or discipline a licensee for any of the following:

(a) Unprofessional conduct, including, but not limited to, the following:

(e) Conviction of a crime or of any offense substantially related to the qualifications, functions, or duties of a licensee, in which event the record of the conviction shall be conclusive evidence thereof."

5. Section 2570.29 states:

"In addition to other acts constituting unprofessional conduct within the meaning of this chapter, it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(c) Be convicted of a criminal offense involving the prescription, consumption, or self-administration of any of the substances described in subdivisions (a) and (b) of this section [controlled substances, dangerous drugs, alcoholic beverages], or the possession of, or falsification of a record pertaining to, the substances described in subdivision (a) of this section, in which event the record of the conviction is conclusive evidence thereof."

6. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case:

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FIRST CAUSE FOR DISCIPLINE

Bus. & Prof. Code §§2570.28(e)

(Criminal Convictions)

7. Respondent is subject to discipline under Code section 2570.28(e) in that she has been convicted of crimes which are substantially related to the qualifications, functions and duties of a licensed occupational therapist. The circumstances are as follows:

8. On or about February 9, 2004, respondent pled Nolo Contendere to a violation of Penal Code section 273(a), Child Endangerment, a felony, and Vehicle Code section 23152(b), Driving Under the Influence, a misdemeanor, which occurred on or about December 28, 2003. (*Superior Court of San Luis Obispo County, Case No. F000351471*) Respondent was ordered to serve 30 days in the Alameda County Jail, pay various fines, probation for three years, and perform the following;

- a. Submit to chemical testing;
- b. Cooperate in counseling programs;
- c. Attend and complete a child abuse prevention and treatment program; and
- d. Enroll and complete the 2nd Offender Drinking Driver Program.

9. The circumstances of the convictions are that on or about December 28, 2003, respondent was driving erratically as she traveled northbound on Highway 101. When stopped by the police, respondent appeared in a stupor and she smelled of alcohol. She had in her possession a half full and open bottle of Smirnoff Vodka and a quart carton of orange juice. There was also a child's plastic cup containing orange juice and vodka found on the driver's floor board indicating respondent had been drinking and driving. Her six year old daughter was seated on the right front seat of the car. Traffic was heavy due to the Christmas holiday. Respondent's blood alcohol exceeded the legal limit. Respondent resisted arrest. She had to be restrained with a leg restraining strap.

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1 10. On or about October 30, 2000, respondent pled Nolo Contendere to a violation
2 of Vehicle Code section 23152(a), Driving Under the Influence, a misdemeanor, which
3 occurred on or about August 5, 2000. (*Superior Court of Alameda County, Case No. 458926*)
4 Respondent was ordered to pay various fines, probation for three years and perform the following:

5 a. 90 day driver's license restriction; and

6 b. Attend DUI School.

7 11. On or about September 24, 1993, respondent pled Guilty to a violation of
8 Vehicle Code section 23152(b), Driving With A 0.08 Or Higher Blood Alcohol, a misdemeanor,
9 which occurred on or about July 23, 1993. (*Municipal Court of Santa Clara County,*
10 *Case No. C9349463*). Respondent was ordered to pay various fines, three years probation,
11 seven days in jail and enroll and complete the First Offender Alcohol Program.

12 SECOND CAUSE FOR DISCIPLINE

13 Bus. & Prof. Code §§2570.29(C)
14 (Driving Under the Influence Convictions)

15 12. Paragraphs 8, 9, 10 and 11 above are herein incorporated by reference as though
16 fully set forth.

17 13. Respondent is subject to discipline under Code section 2570.29(c) in conjunction
18 with Code section 2570.28(a) in that she has been convicted of criminal offenses involving
19 the consumption of alcoholic beverages, as alleged in paragraphs 8, 9, 10 and 11.

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PRAYER

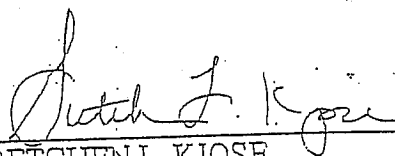
WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the California Board of Occupational Therapy issue a decision:

1. Revoking or suspending Occupational Therapist License Number OT 6305, issued to Terri Ann Schonbrod;

2. Ordering Terri Ann Schonbrod to pay the California Board of Occupational Therapy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED: August 26, 2004



GRETCHEN L. KIOSE
Executive Officer
California Board of Occupational Therapy
Department of Consumer Affairs
State of California

Complainant